

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

**OUTMEMPHIS,**

**Plaintiff,**

**v.**

**BILL LEE, in his official capacity as Governor of Tennessee, and JONATHAN SKRMETTI, in his official capacity as Attorney General and Reporter of Tennessee,**

**Defendants**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**STATE OF TENNESSEE, and TENNESSEE BUREAU OF INVESTIGATION,**

**Defendants**

Case Nos. 2:23-cv-2670, 2:24-cv-2101

**CHIEF JUDGE LIPMAN**

---

**UNITED STATES' UNOPPOSED MOTION FOR LEAVE TO FILE REPLY IN SUPPORT OF MOTION TO COMPEL**

---

Plaintiff United States of America respectfully moves pursuant to Local Rule 7.2(c) for leave to file a reply in support of its Motion to Compel (ECF No. 73). Defendants filed their response in opposition to the Motion to Compel on September 27, 2024, making a motion for leave to file a reply due by October 4, 2024.

Plaintiff seeks to file a reply to respond to discrete legal arguments raised in the

Defendants' response to aid the Court in resolving the pending Motion to Compel. A copy of the proposed Reply is attached to this motion. The reply conforms with Local Rule 7.2(e), as it is five pages excluding case caption, signature block, and the certificate of service. Counsel for Defendants does not oppose this request for leave to reply.

Because good cause exists to grant leave for Plaintiff to file a reply, the Court should grant this motion and permit the attached reply to be filed as a separate docket entry.

Dated: October 2, 2024

REBECCA B. BOND  
Chief

/s/ Ali N. Szemanski  
KEVIN KIJEWSKI  
Deputy Chief  
STEPHANIE M. BERGER  
NY Bar #5201439  
ALI N. SZEMANSKI  
PA Bar #327769  
ANNA G. BOBROW  
DC Bar #1743249  
Trial Attorneys  
Disability Rights Section  
Civil Rights Division  
U.S. Department of Justice  
150 M Street NE  
Washington, D.C. 20002  
202-307-0663  
Stephanie.Berger@usdoj.gov  
Ali.Szemanski@usdoj.gov  
Anna.Bobrow@usdoj.gov

*Counsel for United States*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing was filed and served via the Court's electronic filing system on this the 2nd day of October 2024, upon:

Cody N. Brandon  
Managing Attorney  
Assistant Attorney General

David M. Rudolph  
Senior Assistant Attorney General

Law Enforcement &  
Special Prosecutions Division  
Office of the Tennessee  
Attorney General & Reporter  
500 Charlotte Avenue  
Nashville, TN 37202  
Off. (615) 532-2552  
Fax (615) 532-4892

[Cody.Brandon@ag.tn.gov](mailto:Cody.Brandon@ag.tn.gov)  
[David.Rudolph@ag.tn.gov](mailto:David.Rudolph@ag.tn.gov)  
*Counsel for Defendants*

Alexis Agathocleous  
Alexis Alvarez  
Jon W. Davidson  
Rachel Meeropol  
AMERICAN CIVIL LIBERTIES UNION  
125 Broad St., New York, NY 10004  
Phone: (929) 585-0061  
[AAgathocleous@aclu.org](mailto:AAgathocleous@aclu.org)  
[AlexisA@aclu.org](mailto:AlexisA@aclu.org)  
[JonDavidson@aclu.org](mailto:JonDavidson@aclu.org)  
[RMeeropol@aclu.org](mailto:RMeeropol@aclu.org)

Stella Yarbrough  
Lucas Cameron-Vaughn  
ACLU FOUNDATION OF TENNESSEE  
P.O. Box 120160  
Nashville, TN 37212  
Phone: (615) 320-7142  
[SYarbrough@aclu-tn.org](mailto:SYarbrough@aclu-tn.org)  
[Lucas@aclu-tn.org](mailto:Lucas@aclu-tn.org)

Lynly S. Egyes  
Milo Inglehart  
TRANSGENDER LAW CENTER  
594 Dean Street, Suite 11  
Brooklyn, NY 11238  
Phone: 510 587-9898 Ext. 353  
[Lynly@transgenderlawcenter.org](mailto:Lynly@transgenderlawcenter.org)  
[Milo@transgenderlawcenter.org](mailto:Milo@transgenderlawcenter.org)

Dale Melchert  
TRANSGENDER LAW CENTER  
P.O. Box 70976  
Oakland, CA 94612  
Phone: (510) 587-9696 Ext. 354  
[Dale@transgenderlawcenter.org](mailto:Dale@transgenderlawcenter.org)  
*Counsel for Plaintiff OUTMemphis*

/s/ Ali N. Szemanski  
Ali N. Szemanski